

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Case No.: 1:22-10998

SRINIVAS PARUCHURI,

Plaintiff,

v.

RE.IMAGIN, INC.; JENNIFER SNAPE; and
“JOHN DOE” and “JANE DOE,” numbers 1
through 10, fictitiously named parties or entities,
true names unknown, the parties intended being
the managers, operators, or successors of the
business being carried on by defendants
RE.IMAGIN, INC.; JENNIFER SNAPE,

Defendants.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that defendants Re.Imagin, Inc. (“Re.Imagin”) and Jennifer Snape (“Snape” and together with Re.Imagin, the “Defendants”) hereby remove this action, currently pending in the Supreme Court of New York, New York County, Index No. 654311/2022, to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. §§ 1332 and 1441. As required by 28 U.S.C. § 1446(a), copies of all process, pleadings, and orders served upon Defendants are attached hereto as Exhibit A.

In support of this Notice of Removal, Defendants state:

1. On November 10, 2022, plaintiff Srinivas Paruchuri (“Plaintiff”) filed a Summons and Verified Complaint (the “Complaint”) against defendants Re.Imagin, Inc. and Jennifer Snape in the Supreme Court of New York, New York County (Index No. 654311/2022). (Ex. A at NYSCEF 1).

2. On December 1, 2022, Defendants accepted service of the Summons and Complaint. (Ex. A at NYSCEF 27). Defendant Re.Imagin had not previously been served. Accordingly, this Notice of Removal is timely filed within the thirty days allotted for removal by 28 U.S.C. § 1446(b).

3. Plaintiff alleges that he is an individual residing in the State of Connecticut. (Complaint ¶ 1).

4. Defendant Snape is now, and was when this action was commenced, an individual domiciled in the United Kingdom. (Declaration of Jennifer Snape (the “Snape Decl.”) ¶ 2).

5. Defendant Re.Imagin is now, and was when this action was commenced, a corporation organized under the laws of the State of Delaware, with its principal place of business in the United Kingdom. (Snape Decl. ¶ 6).

6. There are no other defendants in this action other than fictitiously named defendants. Pursuant to 28 U.S.C. § 1441(b)(1), “the citizenship of defendants sued under fictitious names shall be disregarded” for purposes of determining whether this civil action is removable on the basis of jurisdiction under Section 1332(a).

7. The Complaint seeks money damages of more than \$4 million, exclusive of interest and costs, due to, *inter alia*, an alleged breach of contract, fraud, breach of fiduciary duty, and unjust enrichment.

8. Accordingly, jurisdiction is proper before this Court pursuant to 28 U.S.C. § 1331, and this case is properly removed pursuant to 28 U.S.C. § 1441, because there is complete diversity among the parties, no defendant is a citizen of the State of New York, and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

9. Venue is proper pursuant to 28 U.S.C. § 1441(a) because this Court is the United States District Court for the district and division embracing the place wherein the state action is pending.

10. Promptly upon filing this Notice of Removal with this Court, Defendants will give written notice of this removal to counsel for Plaintiff, and will also file a copy of this Notice with the Clerk of the Supreme Court of New York, New York County.

11. By filing this Notice of Removal, Defendants do not waive, and hereby reserve, all defenses that they may have, including defenses based on lack of personal jurisdiction.

WHEREFORE, Defendants respectfully give notice that this action is to be, and hereby is, removed from the Supreme Court of New York, New York County, to the United States District Court for the Southern District of New York.

Dated: December 30, 2022
New York, New York

Respectfully submitted,

/s/ Renee Zaytsev
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Attorney for Defendants
Re.Imagin, Inc. and Jennifer Snape

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing Notice of Removal was served by First Class Mail this 30th day of December, 2022, upon the following:

Brandon McKenzie, Esq.
Moss & Moss LLP
381 Park Avenue South, Suite 1220
New York, New York 10016

Attorney for Plaintiff
Srinivas Paruchuri

/s/ Renee Zaytsev
Attorney for Defendants
Re.Imagin, Inc. and Jennifer Snape